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April 15, 2010

Mr. James J. Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

Re: Completion of Groundwater Delineation Study, Western Lagoon Area North Bronson Industrial Area Site Operable Unit 1, Bronson, Michigan

Dear Mr. Hahnenberg:

This correspondence, prepared on behalf of the North Bronson Industrial Area (NBIA) Operable Unit 1 Potentially Responsible Parties Group (the Group), provides follow-up to the March 29 and March 31, 2010 conference call discussions among representatives of the U.S. Environmental Protection Agency (USEPA), the Michigan Department of Natural Resources & Environment (MDNRE), and the Group regarding the scope of work for completing the Groundwater Delineation Study associated with the Western Lagoon Area of the NBIA Site. To resolve the differing technical viewpoints and reach a mutually acceptable scope of work for completing the delineation of the limits of impacted groundwater north and west of the Western Lagoon Area (*i.e.*, between the Western Lagoons and the residents along Burr Oak Road who employ private wells), the Group proposes to modify the plans set forth in its January 27, 2010 correspondence as described herein.

Overall, the revised scope of work calls for installation of five groundwater monitoring wells, which have been designated MW-41, MW-46, MW-47, MW-48, and MW-49. As described in Table 1, vertical aquifer profiling (VAP) will be conducted in Geoprobe® borings to site certain wells and to evaluate potential preferential pathways of volatile organic compound ~~(VOC) transport within the upper aquifer.~~ Selected boring locations will then be overdrilled, and ground water monitoring wells will be installed. Procedure and methodologies for VAP sampling and well installation are defined in the USEPA-approved *Groundwater Delineation Work Plan* (O'Brien & Gere, Inc, February 2008).

MW will be installed promptly after boring locations are ~~complete~~ complete. wells will be plugged promptly

A round of water levels and groundwater samples will then be collected from the five newly installed wells and from the following previously installed wells: MW-6D, MW-33I, MW-39, MW-40, MW-42, MW-43, MW-44S, MW-44D, MW-45S, and MW-45D.

(1) Once data is collected from borings, the boring location will be promptly plugged.

Collected samples will be analyzed for VOCs, metals, and cyanide, per the *Groundwater Delineation Work Plan.* A report of the additional investigations will be prepared to update the *Preliminary Ground Water Delineation Data Report* (O'Brien & Gere, Inc., January 2009).

The expected outcome is that wells MW-41, MW-46, MW-47, and MW-48 will be situated at or beyond the leading edge of VOC impacts in groundwater and will allow for identification of those properties in Bronson Township for which restrictive covenants on groundwater usage may potentially be required. It is anticipated that MW-41 and MW-46 in particular will serve as unimpacted sentinel wells between the Western Lagoon Area and the nearest current potential receptors. Well MW-49 may or may not show VOC impacts, but, in any case, will serve as a monitoring location for groundwater elevations and groundwater chemistry.

We believe the revised investigative program is responsive to the concerns raised by MDNRE for completing the Groundwater Delineation Study associated with the Western Lagoon Area. The Group respectfully requests USEPA's written confirmation that, unless the results of the study show conditions significantly different from expectations, the described scope of work satisfies USEPA's requirements for completing the Operable Unit 1 Groundwater Delineation Study for the Western Lagoon Area under the provisions of the Consent Decree. Upon receipt of this confirmation, the Group will proceed with this study.

If you have questions regarding this submittal or related project matters, please do not hesitate to contact me.

Respectfully submitted,

Leo M. Brausch
Project Coordinator

LMB:
Attachments

cc: Deborah D. Larsen, MDNRE
Charles W. Graff, MDNRE

cc (via email):
NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee
Clifford S. Yantz, O'Brien & Gere, Inc.

Agencies "expectation" vague - we do not agree to do this

If our groundwater is considered fully characterized... Several days prior to mobilization for field activities.

TABLE

Table 1
Revised Soil Boring and Groundwater Monitoring Well Locations
Completion of Groundwater Delineation Study
Western Lagoon Area, NBIA Operable Unit 1[1,2]

Soil Boring/ Well No.	Description
GP-25, GP-25A, and GP-21; MW-48	Install a Geoprobe® boring with vertical aquifer profiling (VAP) just north of County Drain #30 (CD#30) at the GP-25 location identified by MDNRE in its March 29, 2010 email. • If the VAP sampling results show the groundwater to be "clean" at the GP-25 location,[3] install a second Geoprobe® VAP boring (GP-25A) at a location along the north bank of CD#30 approximately 180 feet to the southeast (*i.e.*, midway between GP-25 and existing well MW-43). If the VAP sampling results show groundwater at GP-25A is clean, install well MW-48 at GP-25A. If not, install MW-48 at GP-25. • If the VAP sampling results do not show the groundwater to be clean at GP-25, install a second Geoprobe® VAP boring (GP-21) at a location along the north bank of CD#30 approximately 180 feet to the northwest (*i.e.*, opposite existing well MW-42). Install well MW-48 at this GP-21 location.
GP-24 and GP-24A MW-47	Install a Geoprobe® VAP boring at the GP-24 location identified by MDNRE in its March 29, 2010 email. • If the VAP sampling results shown the groundwater to be clean at GP-24, install well MW-47 at GP-24. • If the VAP sampling results do not show the groundwater to be clean at GP-24, install a second Geoprobe® VAP boring (GP-24A) at a location along the existing irrigation pipeline approximately 125 feet to the northwest. Install MW-47 at this GP-24A location.
GP-22 MW-46	Install a Geoprobe® VAP boring GP-22 in the east side of the right-of-way of Burr Oak Road at the location proposed in the Group's January 27, 2010 correspondence. Install well MW-46 at this location.
GP-23 MW-41	Install Geoprobe® VAP boring GP-23 in the east side of the right-of-way of Burr Oak Road at the location identified by MDNRE in its March 23, 2010 email (*i.e.*, approximately 80 feet southeast of where proposed in the Group's January 27, 2010 correspondence). Install well MW-41 at this location.

See footnotes at end of table.

Table 1
Revised Soil Boring and Groundwater Monitoring Well Locations
Completion of Groundwater Delineation Study
Western Lagoon Area, NBIA Operable Unit 1

Soil Boring/ Well No.	Description
GP-26 MW-49	Install Geoprobe® boring at the GP-26 location identified by MDNRE in its March 29, 2010 email as needed to determine lithology. No VAP sampling will be performed in this boring.[4] Install monitoring well MW-49 at this location. Set screen depth based on observed lithology (*i.e.*, sand layer) and prior VAP sampling results for GP-17 and GPMW-41.

drill treatment for GP26 to, as we anticipate they will ~~be done at~~ do for all locations

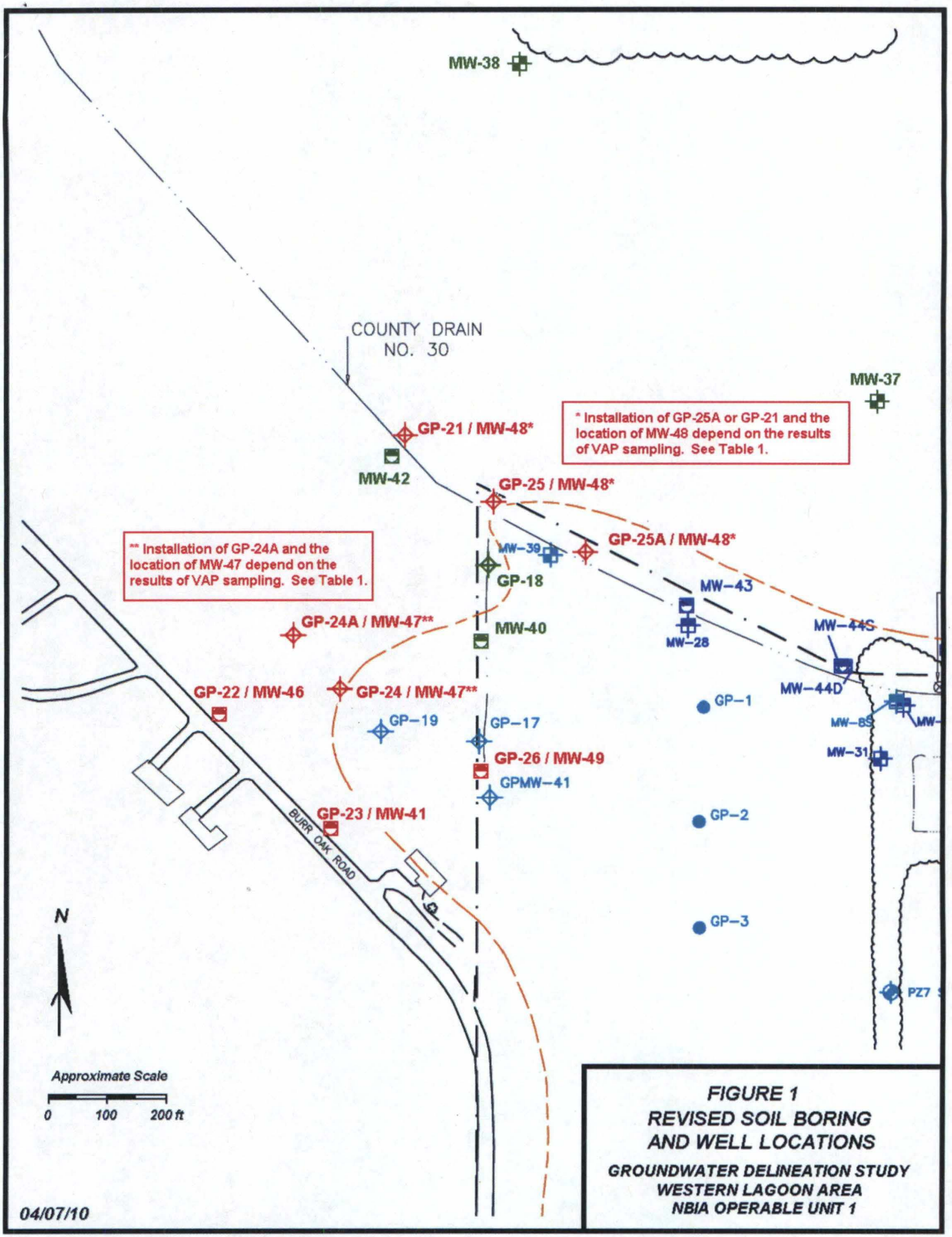
[1] For clarity, the proposed boring/well locations are presented in the order in which they would be installed.

[2] Boring and well locations are shown in Figure 1.

[3] The designation of "clean" groundwater is shorthand for the condition where testing results do not do not indicate the presence of volatile organic compounds (VOCs) or metals above Site boundary criteria.

[4] As an option, install boring using the hollow-stem auger rig (on site for well installation) and split-spoon (or 5-foot continuous) samplers to log lithology in advance of setting monitoring well MW-49. Decision on which option to use will be made by the Group and depends on the timing of the field work and driller costs.

FIGURE


MW-38
COUNTY DRAIN
NO. 30
MW-37
GP-21 / MW-48*
MW-42
* Installation of GP-25A or GP-21 and the location of MW-48 depend on the results of VAP sampling. See Table 1.
GP-25 / MW-48*
** Installation of GP-24A and the location of MW-47 depend on the results of VAP sampling. See Table 1.
GP-25A / MW-48*
MW-39
GP-18
MW-43
GP-24A / MW-47**
MW-40
MW-28
MW-44S
GP-22 / MW-46
GP-24 / MW-47**
MW-44D
GP-1
GP-19
GP-17
MW-8S
MW-31
GP-26 / MW-49
GPMW-41
GP-23 / MW-41
BURR OAK ROAD
GP-2
GP-3
PZ7
N
Approximate Scale
0
100
200 ft
04/07/10
FIGURE 1
REVISED SOIL BORING
AND WELL LOCATIONS
GROUNDWATER DELINEATION STUDY
WESTERN LAGOON AREA
NBIA OPERABLE UNIT 1